

Exhibit 3

From: [Paven Malhotra](#)
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Subject: CIR v OpenAI et al
Date: Wednesday, October 2, 2024 10:36:18 AM

New York Times and Daily News Counsel,

OpenAI and Microsoft intend to request the Court consolidate the lawsuit filed by the Center for Investigative Reporting (CIR) with the already consolidated NYT-Daily News case. In making this request, Defendants will ask the Court to place the CIR case on the same schedule as the NYT-Daily News case. Defendants anticipate filing such a motion this week such that it is fully briefed before the October 30 status conference. Defendants will also place the matter on the agenda for the October 30 status conference. Please let us know if NYT and Daily News would like to take a position now or would prefer to wait until after reviewing Defendants' as-filed consolidation motion. Counsel for CIR has indicated that it currently opposes consolidation but is still considering the matter.

Regards,
Paven